

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE

AT \_\_\_\_\_

FILED

MAR 03 2016

Clerk, U.S. District Court  
Eastern District of Tennessee  
At Chattanooga

DAVID R. PAYNE )  
228 BROWNS GAP RD )  
CROSSVILLE, TN. 38555 )  
Name of plaintiff (s) )

v. )

Case No. 1:16-cv-49 Phillips/Steger

(to be assigned by Clerk)

NATIONAL MUTUAL INSURANCE CO. )  
CELINA INSURANCE GROUP )  
ROBERT HARVEY )  
Name of defendant (s) )

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

THESE INSURORS DID WITHHOLD REPORTS, ENGINEER  
REPORTS AND PAPERS FROM THE PLAINTIFF AND THP  
DURING ACTIVE INVESTIGATION

2. Plaintiff, DAVID R. PAYNE resides at

228 BROWNS GAP RD. CROSSVILLE  
street address city

CUMBERLAND, TN 38555 931-788-6374  
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

\_\_\_\_\_  
\_\_\_\_\_

3. Defendant, NATIONAL MUTUAL INSURANCE <sup>CELIA</sup> lives at, or its business is located at

1 INSURANCE SQUARE, CELIA,  
street address  
OHIO, 45822.  
county state city zip code

(if more than one defendant, provide the same information for each defendant below)

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

INSURED WAS IN CAR CRASH. INSURED  
WAS CONSIDERED AT FAULT. INSURED  
WAS INJURED, BUT COULD NOT MAKE  
CLAIM BECAUSE OF WITHHELD DOCUMENTS  
INSURED HAD NO FAULT AND DID NOT  
FILE SUIT UNTIL THIS DATE. INSUROR  
CLAIMS SELF-DEFENSE IN GENERATION  
OF THESE DOCUMENTS, THOUGH A FIFTY-  
FIFTY WAS IN PLACE BETWEEN THE INSURORS

5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. ALL DOCUMENTS GIVEN TO  
PLAINTIVE
- b. DAMAGES
- c. PAIN & SUFFERING
- d. MENTAL STRESS

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 3<sup>RD</sup> day of MARCH, 2016.

David R. Payne

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Signature of plaintiff (s)